

EXHIBIT F

CHUCHRAN v. COUNTY OF MACOMB, ET AL.

ELIZABETH ANN CANFIELD

April 11, 2017

Prepared for you by



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<p style="text-align: center;">Page 13</p> <p>1 A. Uh-huh.</p> <p>2 Q. (Reading.)</p> <p>3 "The agency stopped accessing LEIN for</p> <p>4 civil paternity cases after being informed by</p> <p>5 staff in late 2014 of the unauthorized nature</p> <p>6 of these inquiries."</p> <p>7 So, I'll stop right there.</p> <p>8 Am I correct that it's illegal to access LEIN for</p> <p>9 civil paternity cases?</p> <p>10 A. It is against policy, yes.</p> <p>11 Q. Is it also illegal or against policy to access LEIN for</p> <p>12 any civil purpose?</p> <p>13 A. Yes.</p> <p>14 Q. And when we say "civil," I have a definition here, but</p> <p>15 as I understand it, "civil" means any matter that --</p> <p>16 where there -- well, let me get the definition.</p> <p>17 It's not part of the criminal justice system; is</p> <p>18 that correct?</p> <p>19 A. Yes.</p> <p>20 Q. And there is no court order that is yet involved?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. Okay. When else did you talk to Mr. Keith?</p> <p>23 A. Again, that's all the calls I have documented. It's my</p> <p>24 vague recollection that I may have spoken to him one or</p> <p>25 more times after that, again, regarding questions he had</p>	<p style="text-align: center;">Page 15</p> <p>1 A. These right here.</p> <p>2 MR. FLEURY: What? The first paragraph? Is that</p> <p>3 what you were just talking about?</p> <p>4 A. Right here.</p> <p>5 MS. GORDON: Tell you what. Let's do this: I'm</p> <p>6 going to hand you Exhibit 1, just so we'll all be on</p> <p>7 the -- literally the same page with this.</p> <p>8 (Deposition Exhibit 1 marked</p> <p>9 for identification.)</p> <p>10 BY MS. GORDON:</p> <p>11 Q. Why don't you identify for the record, Ms. Canfield,</p> <p>12 each page of Exhibit 1, and then we'll have it on the</p> <p>13 record.</p> <p>14 So, the first page looks like a file folder.</p> <p>15 A. Yes.</p> <p>16 Q. Just a black paper.</p> <p>17 A. Yeah.</p> <p>18 Q. Okay.</p> <p>19 A. The second page is the closing correspondence that was</p> <p>20 written December 20th, 2016, advising the Macomb County</p> <p>21 Prosecutor that we were satisfied with the steps that</p> <p>22 they took to resolve the complaint, and that it was</p> <p>23 closed.</p> <p>24 The next page is what we call our case file notes.</p> <p>25 This is where I document the significant events along</p>
<p style="text-align: center;">Page 14</p> <p>1 as part of the case. But we don't generally retain</p> <p>2 those documents in a routine complaint because the goal</p> <p>3 of the process is to help the agency get things</p> <p>4 completed and, generally speaking, dates don't come into</p> <p>5 it. The final case is important.</p> <p>6 I documented the telephone call because Mr. Keith</p> <p>7 had requested to make sure that we were aware that they</p> <p>8 had stopped using LEIN for that purpose back in 2014,</p> <p>9 and so I did make a note of that.</p> <p>10 Q. And you took him at his word, I assume?</p> <p>11 A. Yes.</p> <p>12 Q. You did no investigation to see what they were doing or</p> <p>13 not doing?</p> <p>14 A. We do not have authority to do that.</p> <p>15 Q. Okay. You do not?</p> <p>16 A. We do not.</p> <p>17 MS. GORDON: Okay. Do you have a --</p> <p>18 BY MS. GORDON:</p> <p>19 Q. I just want to hand you some notes and see if you know</p> <p>20 who wrote these notes. It appears to be --</p> <p>21 A. Yes, these are my notes. I'm sorry.</p> <p>22 Q. These are your notes that we --</p> <p>23 MS. GORDON: You know, in fact, let's --</p> <p>24 MR. FLEURY: I don't know what you're referring to.</p> <p>25 MS. GORDON: I know.</p>	<p style="text-align: center;">Page 16</p> <p>1 the case, the opening report, the correspondence, any</p> <p>2 updates that occur, and then the final closing reports.</p> <p>3 And it's reviewed by three people before it goes up</p> <p>4 to Ms. Brinningstaull for final signature.</p> <p>5 And the final page is the opening correspondence</p> <p>6 that we sent on May 18th, 2016, regarding the complaint</p> <p>7 that we received. It documents the allegations that</p> <p>8 were made, or the issues that we believe we have concern</p> <p>9 about, and the directions to the agency and how -- the</p> <p>10 steps that need to be taken to resolve them.</p> <p>11 Q. Okay. Now, I'm going to hand you something different,</p> <p>12 which is Chuchran Bates stamp 268 for the record.</p> <p>13 And those look to be notes from somebody at the</p> <p>14 Michigan State Police.</p> <p>15 Do you recognize the stamp on the bottom there,</p> <p>16 "Michigan Crime Conference, Michigan State Police"?</p> <p>17 A. I do.</p> <p>18 Q. Do you know what this is?</p> <p>19 A. I believe this is -- I recognize the handwriting as</p> <p>20 Mr. Kevin Collins. He was the person that passed me the</p> <p>21 initial complaint regarding the misuse and requested</p> <p>22 that I open an investigation and send correspondence.</p> <p>23 Q. Do you understand that those are notes of a conversation</p> <p>24 with Bob Chuchran?</p> <p>25 A. Yes.</p>

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